

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PATRICIA MORRIS-GIBSON,

Plaintiff,

v.

THE INTERNATIONAL UNION,
UNITED AUTOMOBILE,
AEROSPACE AND AGRICULTURAL
IMPLEMENT WORKERS OF
AMERICA (UAW), et al.,

Defendants.

Case No. 2:20-cv-11346

Hon. Mark A. Goldsmith

Mag. Judge Anthony P. Patti

DEFENDANTS' MOTION TO STAY PRETRIAL DEADLINES

Defendants United Autoworkers International Union, Gerald Kariem, and George Hardy (collectively, the “UAW Defendants”); and Defendant Miguel Foster, through undersigned counsel, respectfully submit this Motion to Stay Pretrial Deadlines.

In support of this Motion to Stay Pretrial Deadlines, Defendants state as follows:

1. Pursuant to the Case Management and Scheduling Order entered by the Court on or about September 10, 2020, Dkt. No. 24, the parties are supposed to submit Lay Witness Lists and Exhibit Lists by May 20, 2021.

2. As set forth in the Joint Report on Alternative Dispute Resolution filed by the parties on April 13, 2021, Dkt. No. 27, the parties are scheduled to conduct a facilitative mediation before Judge Wendy Baxter on May 21, 2021.

3. If the scheduled facilitative mediation is unsuccessful, Defendants will need to conduct additional discovery to identify the witnesses and exhibits they plan to introduce at trial. Accordingly, Defendants cannot at present provide a complete trial exhibit list or witness list.

4. If the facilitative mediation is unsuccessful, Defendants will meet and confer with counsel for the Plaintiffs and will propose a new set of pretrial deadlines that enables the parties to take needed discovery in this case. Defendants shall propose a new set of pretrial deadlines on or before June 11, 2021.

5. In accordance with Local Rule 7.1(a) and Judge Goldsmith's Individual Practices, Counsel for the UAW Defendants certifies that, on Wednesday May 12, 2021, Friday May 14, 2021, and Monday May 17, 2021, counsel for the UAW Defendants requested in writing to meet and confer with Plaintiff's counsel regarding these pretrial deadlines and suggested that the parties request relief from the Court with respect to those deadlines. Counsel further certifies that at least three business days have lapsed without opposing counsel expressly agreeing to the relief, orally or in writing.

6. A Proposed Order is being submitted contemporaneously with this Motion to Stay Pretrial Deadlines.

Respectfully submitted:

Dated: May 20, 2021

s/ Adam Bellotti

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Counsel for Miguel Foster

CERTIFICATE OF SERVICE

I certify that on May 20, 2021, I caused the foregoing paper to be electronically filed with the Clerk of the Court using the ECF system which will send notification of filing to all participating in the CM/ECF system.

s/ Adam Bellotti

Adam Bellotti (DC 1020169)

BREDHOFF & KAISER, PLLC